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May 27, 2014

**VIA ECF**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: In re Residential Capital, LLC, et al., Case No. 12-12020 (MG)

Dear Judge Glenn:

I am writing as counsel to the ResCap Liquidating Trust (the “**Liquidating Trust**”), the successor in interest to the debtors in the above-referenced chapter 11 cases (collectively, the “**Debtors**”), in connection with the *Motion of the ResCap Liquidating Trust for an Order Enforcing Plan Injunction Against Karla Brown* [Docket No. 6687] (the “**Motion**”) seeking to enforce the injunction provisions of the confirmed plan of reorganization and enjoin Karla Brown (the “**Plaintiff**”) from further prosecution of her pending action in Massachusetts state court against Philip Brown, a former employee of Debtor GMAC Mortgage, LLC.

At the April 24, 2014 hearing on the Motion, the Court agreed, at the request of the parties, to adjourn the hearing to June 10, 2014 to allow the parties additional time to reach a global settlement that would resolve the Motion, as well as the Plaintiff’s claims against the Debtors and Philip Brown. The Court also requested that the parties submit a letter by May 27, 2014 to inform the Court as to the status of the parties’ discussions and whether they expect the hearing on the Motion to go forward. The Liquidating Trust is submitting this letter with the consent of the Plaintiff.

Since the hearing, counsel to the Liquidating Trust, the Borrower Claims Trust, and the Plaintiff engaged in extensive good-faith negotiations in an effort to reach a global settlement. As of this writing, the matter is resolved and the parties are in the process of memorializing the settlement in writing.

As requested by the Court, we will provide a further update to the Court by June 3, 2014 (*i.e.*, one week before the hearing on the Motion) as to the status of finalization of the settlement papers.

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Respectfully submitted,

  
Douglas H. Manna

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